

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DELAWARE MARKETING PARTNERS,
LLC, a Delaware limited liability company,

Plaintiff

CA No.: 04-263

v.

JUDGE McLAUGHLIN AND
MAGISTRATE JUDGE
SUSAN PARADISE BAXTER

CREDITRON FINANCIAL SERVICES,
INC, a Pennsylvania corporation, and,
TELATRON MARKETING GROUP,
INC., a Pennsylvania corporation,

TRIAL BY JURY DEMANDED

Defendants

**PLAINTIFF'S SECOND SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION DIRECTED TO DEFENDANTS**

COMES NOW, the Plaintiff, DELAWARE MARKETING PARTNERS, LLC, by and through counsel, and herewith files and serves upon Defendants, CREDITRON FINANCIAL SERVICES, INC. and TELATRON MARKETING GROUP, INC., the following INTERROGATORIES AND REQUESTS FOR PRODUCTION to be answered by Defendants under oath and within thirty (30) days in accordance with the Rule 33(b) of the Federal Rules of Civil Procedure.

1. Please state whether any legal action, including but not limited to: civil or criminal complaint, action for declaratory or injunctive relief, or writ of summons, has been initiated against any of the following entities within the last five years:

Creditron Capital Corporation
Creditron Financial Corporation
Creditron Financial Services, Inc.
Academic Lending Center
Telatron Marketing Group, Inc.

ANSWER:

C

2. If the answer to the above Interrogatory is in the affirmative, for each legal action initiated against the above entities, please state:

- a. The State and County where filed;
- b. The named parties;
- c. The court docket number;
- d. The current disposition of the legal action;
- e. Whether the parties have entered into any settlement agreements. If so, please provide a copy of the same.

ANSWER:

3. Please provide all documents which evidence and/or show the alleged decline in performance of the leads supplied by Plaintiff.

ANSWER:

4. Please provide all documents that refer to, or otherwise reflect, communications from Defendants to Plaintiff regarding or relating to Plaintiff engaging in non-direct mail advertising.

ANSWER:

5. Please provide all documents that evidence, refer to, outline, show or otherwise reflect projections prepared by, or on behalf of, Academic Lending Center from the time it first discussed student loan consolidations with Plaintiff through the date a contact was executed, including but not limited to projections prepared internally, as well as prepared by Plaintiff.

ANSWER:

6. Please provide all reports showing information with respect to calls made by Academic Lending Center representatives on a daily, weekly and monthly basis beginning on September 11, 2002 and ending on January 9, 2004, including but not limited to information regarding the person called, the time of the call, and the results of the call.

ANSWER:

7. Please provide an organizational chart showing the corporate structure and relationship of the following companies:

Creditron Capital Corporation
Creditron Financial Corporation
Creditron Financial Services, Inc.
Academic Lending Center
Telatron Marketing Group, Inc.

ANSWER:

8. Please produce all documents, including e-mails, reflecting communication to and/or from Defendants' financial control group, as well as Joyce Covatto, relating to funds received from Brazos and the disbursement of those funds.

ANSWER:

9. Please identify the amount and method of payment for all loans generated between January 9, 2004 and September 1, 2004 from lists provided by Plaintiff to Defendants.

ANSWER:

10. Please provide the agreement between Defendants and Sun Trust Bank, or any of its affiliates and/or subsidiaries, relating to any student loan consolidation work performed by Defendants between September 11, 2002 and January 9, 2004.

ANSWER:

11. Please provide all documents relating to any student loan consolidation work performed by Defendants between September 11, 2002 and January 9, 2004 for Sun Trust Bank, or any of its affiliates and/or subsidiaries, with respect to information pertaining to calls made including the person called, the time of the call, and the results of the call.

ANSWER:

12. Please provide the 32 point processing plan referred to in the Agreement between Plaintiff and Defendants.

ANSWER:

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

By 

Steven W. Zoffer, Esq.

PA. I.D. #62497

szoffer@dmclaw.com

Brett W. Farrar, Esq.

PA. I.D. #79217

bfarrar@dmclaw.com

Two PPG Place, Suite 400
Pittsburgh, PA 15222-5402

(412) 281-7272
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

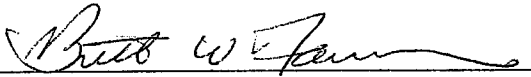
The undersigned hereby certifies that true and correct copies of the foregoing **SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION DIRECTED TO DEFENDANTS** has been served this 31ST day of May, 2006, by Facsimile and U.S. first-class mail, postage prepaid, to counsel of record listed below:

Craig A. Markham, Esquire
Elderkin, Martin, Kelly & Messina
150 East Eighth Street
Erie, PA 16501-1819

Charles Snyderman, Esquire
Charles Snyderman, P.A.
Stoney Batter Office Building
5301 Limestone Road, Suite 214
Wilmington, DE 19808

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

By 
Steven W. Zoffer, Esq.
PA. I.D. #62497
szoffer@dmclaw.com
Brett W. Farrar, Esq.
PA. I.D. #79217
bfarrar@dmclaw.com

Two PPG Place, Suite 400
Pittsburgh, PA 15222-5402
(412) 281-7272

Attorneys for Plaintiff